

AO 91 (Rev. 11/11) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States District Court  
Southern District of Texas  
FILED

FEB 21 2015

David J. Bradley, Clerk

United States of America

v.

Alejandro MARQUEZ

U.S. Citizen

Year of Birth: 1995

Case No. M-15-0268-M

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 08/13/2014 in the county of Hidalgo in the  
Southern District of Texas, the defendant(s) violated:

## Code Section

## Offense Description

21 U.S.C. § 846

Conspiracy to possess with intent to distribute approximately 44.44 kilograms of marijuana a Schedule I controlled substance

21 U.S.C. § 952

Importation of approximately 44.44 kilograms of marijuana, a Schedule I controlled substance.

This criminal complaint is based on these facts:

See Attachment A

☒ Continued on the attached sheet.

Complainant's signature

Ryan Browning, HSI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date:

Feb. 21, 2015 8:02 pm

Judge's signature

City and state:

McAllen, Texas

Peter Ormsby, U.S. Magistrate Judge

Printed name and title

**Attachment A**

The information in this affidavit is provided for the limited purpose of establishing probable cause. This information is not a complete statement of all the facts related to this case.

On August 13, 2014, MARQUEZ applied for entry into the U.S. from Mexico on foot at the Hidalgo Port of Entry in Hidalgo, Texas (Hidalgo POE). 44.44 kilograms of marijuana were discovered in the gas tank of a pickup truck crossing concurrently with MARQUEZ.

On February 20, 2015, Homeland Security Investigations, McAllen, Texas (HSI McAllen) special agents met with Alejandro MARQUEZ to conduct an interview at the Hidalgo POE. MARQUEZ was read his Miranda rights from a preprinted form by HSI Special Agent Ryan Browning. MARQUEZ stated he understood his rights, waived his rights, and agreed to an interview.

During the interview MARQUEZ stated he was paid \$2,500.00 to drive a truck he believed contained marijuana or cocaine from Pharr, Texas to Illinois during June or July of 2014. MARQUEZ stated he suspected the narcotics were located in the gas tank of the vehicle because the vehicle frequently required fuel, the gas gauge incorrectly displayed the tank was half-full when empty, and based on his own inspection of the gas tank. MARQUEZ said he knocked on the bottom of the gas tank with his fist and felt it contained something solid. MARQUEZ told investigators on his return trip he was paid \$1,000.00 to drive a vehicle from Illinois to McAllen, Texas which he suspected contained narcotics or money.

MARQUEZ told investigators on August 13, 2014, he was paid \$400 to smuggle what he believed to be cocaine or marijuana into the U.S. MARQUEZ stated the narcotics were concealed in the same truck used in the previous smuggling trip to Illinois. MARQUEZ said he was a passenger in the vehicle on the bridge into the U.S., but exited the vehicle before the inspection point. MARQUEZ stated he entered the U.S. on foot because he forgot his proof of citizenship and didn't want the vehicle to be referred for a secondary inspection. MARQUEZ said he intended to re-enter the narcotics laden vehicle and deliver it to Illinois where he would be paid an additional \$2,000.00. 44.44 kilograms of marijuana were discovered concealed in the gas tank of the vehicle during a secondary inspection.